

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:)	Chapter 11
)	
JOANN INC., et al. ¹)	Case No. 25-10068 (CTG)
)	
Debtors.)	(Jointly Administered)
)	
)	Re: Docket Nos. 760, 855 & 1111

**CERTIFICATION OF COUNSEL REGARDING FIRST NOTICE
OF ASSUMPTION AND ASSIGNMENT OF CERTAIN
EXECUTORY CONTRACTS AND/OR UNEXPIRED LEASES**

The undersigned counsel to JOANN Inc. and certain of its affiliates, the debtors and debtors in possession in the above-captioned cases (collectively, the “Debtors”), hereby certifies as follows:

1. On April 28, 2025, the Debtors filed the *First Notice of Assumption and Assignment of Certain Executory Contract and/or Unexpired Leases* [Docket No. 760] (the “First Assumption Notice”) regarding the assumption and assignment of certain unexpired leases set forth in the First Assumption Notice (the “Original Assumption List”). Attached to the First Assumption Notice was a proposed form of order (the “Assumption Order”) authorizing the assumption and assignment of the unexpired leases on the Original Assumption List.

2. The deadline to object to the First Assumption Notice was May 12, 2025 (the “Objection Deadline”).

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are: JOANN Inc. (5540); Needle Holdings LLC (3814); Jo-Ann Stores, LLC (0629); Creative Tech Solutions LLC (6734); Creativebug, LLC (3208); WeaveUp, Inc. (5633); JAS Aviation, LLC (9570); joann.com, LLC (1594); JOANN Ditto Holdings Inc. (9652); Dittopatterns LLC (0452); JOANN Holdings 1, LLC (9030); JOANN Holdings 2, LLC (6408); and Jo-Ann Stores Support Center, Inc. (5027). The Debtors’ mailing address is 5555 Darrow Road, Hudson, Ohio 44236.

3. Prior to the Objection Deadline, BV Waco Central Marketplace LLC (“BV Waco”) filed the *Limited Objection to Proposed Cure Amounts Related to Assumption and Assignment of BY Waco Central Texas Marketplace, LLC Lease to SFM, LLC* [Docket No. 855] (the “BV Waco Objection”) objecting to the assumption and assignment of a certain nonresidential real property lease (the “BV Lease Agreement”) dated May 30, 2024 between Jo-Ann Stores, LLC and BV Waco that was included on the Original Assumption List.

4. On June 10, 2025, BV Waco withdrew the BV Waco Objection contingent on the Debtors acknowledging that the proper cure amount for the BV Waco Lease Agreement is \$89,711.82 (the “Cure Amount”) as of June 10, 2025 (the “Assumption Date”). See Docket No. 1111.

5. Attached as Exhibit A is a revised Assumption Order (the “Revised Assumption Order”) acknowledging the Cure Amount and Assumption Date. As part of the resolution of the BV Waco Objection, the landlord has agreed that the BV Lease Agreement can be assumed and assigned as set forth in the Revised Assumption Order.

6. Any unresolved objections and informal comments regarding the remaining balance of the leases included in the First Assumption Notice (collectively, the “Outstanding Leases”) are not included in the Revised Assumption Order. For the avoidance of doubt, the First Assumption Notice remains pending, and has not been withdrawn, with respect to the Outstanding Leases. To the extent that the Debtors and the objecting landlords reach agreement with respect to any Outstanding Lease, the Debtors will submit a proposed form of order with respect to such lease.

7. Accordingly, the Debtors request entry of the Revised Assumption Order attached hereto as Exhibit A at the Court’s earliest convenience.

Dated: June 11, 2025
Wilmington, Delaware

/s/ Jack M. Dougherty

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